LAW OFFICES OF

## JOSHUA L. DRATEL, P.C.

A PROFESSIONAL CORPORATION

29 BROADWAY

Suite 1412 NEW YORK, NEW YORK 10006

TELEPHONE (212) 732-0707 FACSIMILE (212) 571-3792 E-MAIL: JDratel@JoshuaDratel.com USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: DEC 0 5 2014

JOSHUA L. DRATEL

LINDSAY A. LEWIS
WHITNEY G. SCHLIMBACH

STEVEN WRIGHT
Office Manager

December 5, 2014

## BY ELECTRONIC MAIL

The Honorable Katherine B. Forrest United States District Judge Southern District of New York United States Courthouse 500 Pearl Street New York, New York 10007

Re:

United States v. Ross Ulbricht

14 Cr. 68 (KBF)

Dear Judge Forrest:

This letter is submitted on behalf of defendant Ross Ulbricht, and respectfully requests that the Court permit the motions *in limine*, the deadline for which the Court graciously extended until Monday, December 8, 2014, to be filed Tuesday, December 9, 2014, while leaving the time for any replies – due December 12, 2014 – unchanged. I have spoken with Assistant United States Attorney Serrin Turner, who has informed me that the government consents to that modification, including the shortened period in which to respond. I have also informed Assistant United States Attorney Timothy T. Howard that we will serve Mr. Ulbricht's motions *in limine* on the government by 6 p.m. Tuesday, December 9, 2014, in order to afford the government sufficient time to prepare its response.

The additional day will conform the due dates for the *in limine* motions with Mr. Ulbricht's objections to the proposed Government Exhibits, which are closely related and, in some instances, inextricably so. That additional day will thereby enable counsel to address the objections and motions *in limine* in an efficient, comprehensive, and joint fashion, as well as to consult sufficiently with Mr. Ulbricht (to whom we provided the Exhibits today).

Accordingly, it is respectfully requested that the Court grant an additional one day extension until Tuesday, December 9, 2014, for the filing of the motions *in limine*. As noted, the government consents to the one-day extension, with the due date for responses remaining

LAW OFFICES OF

JOSHUA L. DRATEL, P.C.

Hon. Katherine B. Forrest United States District Judge Southern District of New York December 5, 2014 Page 2 of 2

December 12, 2014.

Respectfully submitted,

Joshua L. Dratel

JLD/lal

cc: Serrin Turner

Timothy Howard

Assistant United States Attorneys

SO ORDERED:

HON. KATHERINE B. FORREST UNITED STATES DISTRICT JUDGE